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7 *Attorneys for Defendant Einstein and Noah Corp.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 Kevin Zimmerman, and individual,
12 Plaintiff,
13 vs.
14 Einstein and Noah, Corp.,
15 Defendant.

Case No. 2:17-cv-00403-GMN-GWF

**STIPULATION AND ORDER FOR
EXTENSION TO RESPOND TO
COMPLAINT
(FIRST REQUEST)**

17 Plaintiff Kevin Zimmerman (“Plaintiff”) and Defendant Einstein and Noah Corp.
18 (“Einstein”) by and through their undersigned counsel (collectively the “Parties”), for good cause
19 shown, hereby stipulate and agree to extend Einstein’s deadline to respond to Plaintiff’s
20 Complaint [Doc #12] to May 18, 2017. This is the Parties’ first extension request.

21 Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 6-1, there exists good
22 cause to grant this extension to respond for the following reasons:

- 23 1. Plaintiff served the Complaint and Summons on Einstein on April 11, 2017.
- 24 2. Einstein’s Answer is currently due May 2, 2017.
- 25 3. Counsel for Einstein was only recently retained, and requires additional time to
locate, organize, and review the relevant documents and prepare the appropriate response.
- 26 4. The Parties agreed to the extension requested herein.

1 5. This stipulated extension request is sought in good faith and is not made for the
2 purpose of delay.

3 Therefore, the Parties jointly agree to extend Einstein's deadline to respond to Plaintiff's
4 Complaint to June 2, 2017.

5 DATED: MAY 1, 2017

6 THE WILCHER FIRM

7 By: /s/ Whitney C. Wilcher
8 Whitney C. Wilcher
9 8465 West Sahara Avenue
10 Suite 111-236
11 Las Vegas, Nevada 89117

12 *Attorneys for Plaintiff Kevin Zimmerman*

6 DATED: MAY 1, 2017

7 SNELL & WILMER L.L.P.

8 By: /s/ Michael Paretti
9 Kelly H. Dove
10 Michael Paretti
11 3883 Howard Hughes Parkway
12 Suite 1100
13 Las Vegas, Nevada 89169

14 *Attorneys for Defendant Einstein and Noah Corp.*

15 **ORDER**

16 **IT IS ORDERED** that Einstein shall respond to Plaintiff's Complaint on or before June
17 2, 2017.

18 DATED: May 2, 2017.

19 
20 UNITED STATES MAGISTRATE JUDGE

21 Respectfully submitted,

22 SNELL & WILMER L.L.P.

23 By: /s/ Michael Paretti
24 Kelly H. Dove
25 Michael Paretti
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28 *Attorneys for Defendant Einstein and Noah Corp.*
28 4845-2021-7671